IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

DAVIDA GREEN WILLIAMS,)	
Plaintiff,)	
) Case No.: 07 CV 6216	
V.)	
) Judge Hibbler	
ERIC LACOCO, APRIL PADALIK, and)	
OFFICER KIRK, and VILLAGE OF) Magistrate Judge Ashma	ın
WESTCHESTER, an Illinois municipality,)	
)	
Defendants.)	

AGREED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD

Now come Defendants, Village of Westchester, Illinois, Eric Lacoco, April Padalik and Officer Kirk, by and through their attorneys, Elisha S. Rosenblum and Joshua S. Abern, and hereby move this Court to grant them each an extension of time to answer or otherwise plead to Plaintiff's Complaint pursuant to F.R.C.P. 6(b), and in support of their motion state as follows:

- On October 4, 2007, Plaintiff filed the instant action in the Circuit Court of Cook County, Illinois.
- 2. On November 6, 2007 this case was removed by the Defendants to this Court.
- 3. Pursuant to Federal Rule of Civil Procedure 81(c), Defendants have five (5) days to file their answer or other responsive pleading.
- 4. Defense counsel requires additional time to fully investigate the nature of the claims and defenses thereto and requests an extension of the time to file an answer or other responsive pleading until November 27, 2007.
- 5. No party will be prejudiced by the granting of this motion.
- 6. Plaintiff's counsel has agreed to this motion.

Wherefore, Defendants, Village of Westchester, Illinois, Eric Lacoco, April Padalik and Officer Kirk, respectfully request that this Court grant them each an extension of time to answer or otherwise plead to Plaintiff's Complaint until November 27, 2007 pursuant to F.R.C.P. 6(b).

Respectfully submitted,

VILLAGE OF WESTCHESTER. ERIC LACOCO, APRIL PADALIK, RANDALL KIRK

By: <u>s/Joshua S. Abern</u>

Joshua S. Abern, #6285598

O'Halloran Kosoff Geitner & Cook, LLC

650 Dundee Road, Suite 475 Northbrook, Illinois 60062 Telephone: (847) 291-0200 Facsimile: (847) 291-9230

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CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2007, I electronically filed this Agreed Motion For Extension of Time to Answer or Otherwise Plead with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Daniel Walker, Jr. dan.walkerjr@sbcglobal.net

VILLAGE OF WESTCHESTER. ERIC LACOCO, APRIL PADALIK, RANDALL KIRK

By: s/Joshua S. Abern
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